

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*

Debtors.

PROMESA Title III  
Case No. 17-BK-3283 (LTS)

(Jointly Administered)

**THIRD MONTHLY FEE STATEMENT OF  
ILEANA C. CARDONA FERNANDEZ, ESQ. PROPOSED LOCAL CONFLICTS  
COUNSEL FOR THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR  
PUERTO RICO, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
FOR SERVICES AND DISBURSEMENTS FOR THE PERIOD OF  
JULY 1, 2019 – JULY 31, 2019**

The Commonwealth of Puerto Rico, *et al.*

August 6, 2019

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

**Client Ref. No.** PRO-001

**Invoice No.** 003

Re: The Financial Oversight and Management Board for Puerto Rico,  
as representative of The Commonwealth of Puerto Rico, *et al.*  
Debtors under Title III  
July 1, 2019 – July 31, 2019

Professional services rendered by Ileana C. Cardona Fernández, Esq.  
Local Conflicts Counsel for The Financial Oversight and Management Board for Puerto Rico,  
acting through its Special Claims Committee

**Total Amount of Compensation  
for Professional Services**

**\$4,680.00**

Less Holdback as per Court Order dated June 6, 2018 (DN 3269) (10%)	\$468.00
Interim Compensation for Professional Services (90%)	\$4,212.00
Plus Reimbursement for Actual and Necessary Expenses	\$0.00
Total Requested Payment Less Holdback	\$4,212.00

**FEE STATEMENT INDEX**

<b>Exhibit A</b>	<b>Time and Compensation Breakdown</b>
<b>Exhibit B</b>	<b>Time Entries – Invoice</b>
<b>Exhibit C</b>	<b>Professional Certification</b>
<b>Exhibit D</b>	<b>Principal Certification</b>

# EXHIBIT A

**EXHIBIT A**

**SERVICES RENDERED BY  
ILEANA C. CARDONA FERNÁNDEZ, ESQ.**

**JULY 1, 2019 – JULY 31, 2019**

**TIME AND COMPENSATION BREAKDOWN**

<b>Counsel</b>	<b>Year Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Ileana C. Cardona Fernández	Admitted to Puerto Rico Bar in 2015; Litigation	\$225.00	20.8	\$4,680.00
<b>TOTAL</b>			<b>20.8</b>	<b>\$4,680.00</b>

# **EXHIBIT B**

Ileana C. Cardona Fernández, Esq.  
787-484-8202  
[icardona@iccflaw.com](mailto:icardona@iccflaw.com)

**Invoice No.** 003  
**Client** – PRO-001  
**Date:** August 10, 2019

**BILL TO:**

Puerto Rico Financial Oversight and Management Board,  
acting through its Special Claims Committee  
C/O Jaime A. El Koury, Esq.  
1112 Park Avenue, Apt. 12A  
New York, 10128

Re:

General Matters

Wal-Mart Avoidance Action – Case No. 19-00267  
Microsoft Corporation Avoidance Action – Case No. 19-00290  
Gila, LLC Avoidance Action – Case No. 19-00354  
Hospira PR, LLC Avoidance Action – Case No. 19-00186  
Wells Fargo Avoidance Action – Case No. 19-00360  
First Medical Health Plan, Inc. – Tolling Agreement.  
Instituto de Banca y Comercio, Inc. –Tolling Agreement  
Microsoft Caribbean, Inc. – Tolling Agreement

**INVOICE**

For professional services rendered in connection with the above captioned matters from: July 1, 2019 through July 31, 2019.

**General**

DATE	DETAILS	HOURS	VALUE
7/2/19	Preparation of Second Monthly Fee Statement draft. <b>(0.6 hours)</b>	0.6	\$135.00
7/5/19	Preparation of First Interim Fee Application. <b>(2.8 hours)</b>	2.8	\$630.00
7/8/19	Examined email from R. Sierra re: status of informal resolution process. <b>(0.1 hour)</b>  Continued preparation of First Interim Fee Application <b>(0.3 hours)</b>  Drafted email to BR re: review of IFA. <b>(0.1 hour)</b>	0.5	\$112.50
7/12/19	Examined email by BR team re: general update on status. <b>(0.1 hour)</b>	0.3	\$67.50



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	Calendared and analyzed important dates and milestones DN 7941 Order re: Vendor Action Procedures and Settlement Authority <b>(0.2 hours)</b>		
7/16/19	Finalizing Interim Fee Application. <b>(0.3 hours)</b>	0.3	\$67.50
7/18/19	Email exchange w/ team re: Omnibus hearing. <b>(0.1 hours)</b>	0.1	\$22.50
7/19/19	Prepared and submitted August 2019 budget. <b>(0.2 hours)</b>	0.2	\$45.00
7/24/19	Prepared and submitted Certification for monthly statement June. <b>(0.2 hours)</b>	0.2	\$45.00
7/30/19	Examined email by R. Sierra re: strategy and next steps. <b>(0.2 hours)</b>  Examined email by R. Sierra re: document review and recommendations. <b>(0.1 hour)</b>  Examined, analyzed, and provided comments on proposed NDA draft <b>(0.6 hours)</b>	0.9	\$202.50
7/31/19	Email exchange w/ team re: scheduling strategy call. <b>(0.1 hours)</b>  Examined NDA changes and emails as circulated by team. <b>(0.2 hours)</b>	0.3	\$67.50
	<b>TOTAL</b>	<b>6.2</b>	<b>\$1,395.00</b>

### 19-00267 – Wal-Mart of Puerto Rico

DATE	DETAILS	HOURS	VALUE
7/2/19	Performed research pursuant to call held on 6.25.19 re: transfer of monies and contract substantiation. <b>(1.6 hours)</b>	1.6	\$360.00
7/3/19	Continued research pursuant to call held on 6.25.19 re: transfer of monies and contract substantiation. <b>(2.6 hours)</b>  Performed research re: reasonable equivalence argument applicability to the facts of this case. <b>(0.7 hours)</b>	3.3	\$742.50
7/8/19	Examined Resolution sent by opposing counsel re: conclusion of administrative procedure between vendor and Treasury dept. <b>(0.3 hours)</b>	1.3	\$292.50

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	Documented research results re: transfer of monies and contract substantiation in preparation for phone call with team. ( <b>1 hour</b> )		
7/11/19	Prepared for phone call with team. ( <b>0.3 hour</b> )  Participated in phone call re: results of research w/ US team. ( <b>0.3 hour</b> )  Email to team re: proposed course of action and requirements for executive summary and recommendations. ( <b>0.1 hour</b> )	0.7	\$157.50
7/15/19	Examined email exchange from team re: strategy ( <b>0.1 hour</b> )	0.1	\$22.50
7/18/19	Reviewed documents provided by Walmart counsel and research results in anticipation of preparation of Executive Summary. ( <b>1 hour</b> )  Prepared Executive Summary for team analysis per document exchange, evaluation of facts, and legal research. ( <b>2.3 hours</b> )	3.3	\$742.50
7/19/19	Finalized summary for submission to US team. ( <b>0.7 hour</b> )	0.7	\$157.50
7/26/19	Email exchange w. team re: executive summary ( <b>0.1 hour</b> )	0.1	\$22.50
7/29/19	Email exchange w. opposing counsel re: status of claim determination. ( <b>0.1 hour</b> )	0.1	\$22.50
7/31/19	Examined, downloaded and saved to file DN 7 – Summons returned exec. ( <b>0.1 hour</b> )  Examined email to L. Stafford re: proof of claim. ( <b>0.1 hour</b> )	0.2	\$45.00
	<b>TOTAL</b>	<b>11.4</b>	<b>\$2,565.00</b>

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### 19-00290 – Microsoft Corporation

DATE	DETAILS	HOURS	VALUE
7/2/19	Examined documents sent by opposing counsel in email: Letter; exhibit 1 and exhibit 2. <b>(0.4 hours)</b>	0.4	\$90.00
7/11/19	Examined invoices sent by opposing counsel in email dated 7.9.19 <b>(0.5 hours)</b>	0.5	\$112.50
	<b>TOTAL</b>	<b>0.9</b>	<b>\$202.50</b>

### 19-00360 – Wells Fargo

DATE	DETAILS	HOURS	VALUE
7/11/19	Examined and : DN 6 Notice of Vol. Dismissal WF Clearing. <b>(0.1 hour)</b>	0.1	\$22.50
7/26/19	Examined <i>Order Regarding Stay Period and Mandatory Mediation</i> issued in Title III case and saved to file. <b>(0.2 hours)</b>	0.2	\$45.00
7/30/19	Examined DN 12, DN 13, and DN 14 <b>(0.1 hour)</b>	0.1	\$22.50
	<b>TOTAL</b>	<b>0.4</b>	<b>\$90.00</b>

### First Medical Health Plan, Inc.

DATE	DETAILS	HOURS	VALUE
7/11/19	Examined letter sent by counsel for FM. <b>(0.1 hour)</b>  Discussed approach to answering letter w/ US team. <b>(0.2 hour)</b>  Examined applicable legal standard for response to opposing counsel's request on 7.9.19 <b>(1.1 hour)</b>  Drafted response to letter by counsel for FM. <b>(0.2 hour)</b>	1.6	\$360.00
7/12/19	Finalized and sent response to letter by opposing counsel. <b>(0.1 hour)</b>	0.1	\$22.50
	<b>TOTAL</b>	<b>1.7</b>	<b>\$382.50</b>

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**Date:** August 10, 2019

### **Instituto de Banca y Comercio, Inc.**

<b>DATE</b>	<b>DETAILS</b>	<b>HOURS</b>	<b>VALUE</b>
7/2/19	Email exchange B. Wexler re: call w/ vendor. <b>(0.1 hour)</b>	0.1	\$22.50
	<b>TOTAL</b>	<b>0.1</b>	<b>\$22.50</b>

### **Microsoft Caribbean, Inc.**

<b>DATE</b>	<b>DETAILS</b>	<b>HOURS</b>	<b>VALUE</b>
7/5/19	Examined email by opposing counsel re: additional invoices / contracts. <b>(0.1 hours)</b>	0.1	\$22.50
	<b>TOTAL</b>	<b>0.1</b>	<b>\$22.50</b>

**TOTAL: 20.8 hours**

**\$4,680.00**

**BALANCE DUE:** \$4,680.00

**Check payable to:** Ileana C. Cardona Fernández, Esq.  
Urb. Estancias de San Gerardo  
Calle Orlando #1609  
San Juan, PR 00926

# **EXHIBIT C**

**EXHIBIT C**

**PROFESSIONAL CERTIFICATION**

I hereby certify that no public servant of the Department of Treasury is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the authorized representatives of The Financial Oversight and Management Board for Puerto Rico, acting through its Special Claims Committee. The amount of this invoice is reasonable. The services were rendered, and the corresponding payment has not been made. To the best of my knowledge, Ileana C. Cardona Fernández does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

s/ Ileana C. Cardona Fernandez

**Ileana C. Cardona Fernández**

**USDC-PR Bar No. 302610**

# **EXHIBIT D**

**PRINCIPAL CERTIFICATION**

I hereby authorize the submission of this Third Monthly Fee Statement for Ileana C. Cardona Fernández, Esq. covering the period from July 1, 2019 through July 31, 2019.



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Jaime A. El Koury  
General Counsel to the Financial Oversight  
and Management Board for Puerto Rico